

# UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF WISCONSIN

U.S. District Court  
Wisconsin Eastern

Dec 18 2024

FILED  
Clerk of Court

In the Matter of the Seizure of  
(Address or brief description of property or premises to be seized)

ONE BLACK 2021 LAND ROVER RANGE ROVER EVOQUE  
SPORT UTILITY VEHICLE WITH WISCONSIN LICENSE  
PLATE AWN-4152 AND BEARING VEHICLE IDENTIFICATION  
NUMBER (VIN) SALZP2FX0MH152315

Case Number: 24-M-707

### APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, Jeremy Grobart, being duly sworn depose and say:

I am a Special Agent with the Internal Revenue Service, Criminal Investigation Division, and have reason to believe that in the Eastern District of Wisconsin there is now certain property, namely, one black 2021 Land Rover Range Rover Evoque sport utility vehicle with Wisconsin license plate AWN-4152 and bearing vehicle identification number (VIN) SALZP2FX0MH152315, that is civilly forfeitable under 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C), including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), as property that (1) constitutes or is derived from proceeds traceable to specified unlawful activity, namely, wire fraud in violation of 18 U.S.C. § 1343; and (2) was involved in or is traceable to money laundering transactions in violation of 18 U.S.C. §§ 1956 and 1957, and which property is therefore also subject to seizure for purposes of civil forfeiture under 18 U.S.C. § 981(b).

The application is based on these facts:

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone and email.

December 18, 2024 11:00 a.m.

Date and time issued

William Griesbach, U.S. District Judge  
Name & Title of Judicial Officer

Jeremy Grobart  
Signature of Affiant

Jeremy Grobart, IRS-CI

at Green Bay, Wisconsin  
City and State

William C. Griesbach  
Signature of Judicial Officer



**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR SEIZURE WARRANT**

I, Jeremy Grobart, being duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Criminal Investigation Division of the Internal Revenue Service (IRS-CI), United States Department of the Treasury, and have been since July 2021. Prior to that, I was employed as a Police Officer with the City of Madison, Wisconsin. I also held a Certified Fraud Examiner professional certification and received a Master's in Business Administration with a concentration in Data Analytics from Loyola University Chicago. I have conducted numerous investigations involving violations of the Internal Revenue Code (Title 26, United States Code), the Money Laundering Control Act (Title 18, United States Code), the Bank Secrecy Act (Title 31, United States Code), and other related offenses. I have been the affiant on numerous search warrants, including having participated in the execution of numerous search warrants. I have completed the Criminal Investigator Training Program and the Special Agent Investigative Techniques Program at the Federal Law Enforcement Training Center in Glynco, Georgia, where I received extensive training on financial investigative techniques. My training included lessons in cybercrime investigations, virtual currency, financial investigative techniques, accounting, tax, money laundering, criminal investigation techniques, criminal law, and search warrants.

**II. ITEMS TO BE SEIZED**

2. I submit this affidavit in support of an application for a warrant authorizing the seizure of the following:

- a. A **Gray 2018 Dodge Ram 1500 Crew Cab Pickup Truck** with Wisconsin license plate SC2014 and VIN 3C6RR7LG9JG195986, registered to CHRISTOPHER HARRIS;

- b. A **Black 2021 Land Rover Range Rover Evoque Sport Utility Vehicle** with Wisconsin license plate AWN-4152 and VIN SALZP2FX0MH152315, registered to CHRISTOPHER HARRIS and Julie Harris;
- c. A **Black 2016 Jeep Wrangler Unlimited Sport Utility Vehicle** with Wisconsin license plate ASY-6882 and VIN 1C4BJWDG0GL228332, registered to CHRISTOPHER HARRIS and Julie Harris;
- d. All remaining funds belonging to CHRISTOPHER HARRIS in **Fidelity Investments (“Fidelity”) accounts** bearing numbers **Z23676573** (\$14,559.00 remaining), **Z29149206** (\$14,194.00 remaining), **238950242** (\$19,073.53 remaining), and **257263765** (\$17,988.00 remaining). These accounts will be collectively referred to as “HARRIS’s portfolio,” which has a cumulative total of \$65,814.53 in proceeds remaining; and
- e. All remaining funds belonging to CHRISTOPHER HARRIS in **BMO bank account number 4826752431**, in the name of “**Metro Hoops Inc**” with \$8,240.13 in proceeds remaining.

3. Based on the facts and circumstances set forth below, I submit that there exists probable cause to believe that all of the funds in the accounts listed above, and the assets listed above, are proceeds of or were purchased with proceeds of a fraudulent billing scheme, perpetrated by HARRIS, for which he received proceeds of wire fraud, in violation of Title 18, United States Code, Section 1343. Additionally, I submit that HARRIS used his **Metro Hoops Inc BMO bank account** to create the appearance that the deposited funds were derived from legitimate business activity when in fact the funds were derived from his fraudulent billing scheme, thereby concealing and disguising the nature, location, source, ownership, and control of the proceeds, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i). I further submit that some of HARRIS’s deposits and transfers into the Fidelity and BMO accounts listed above, and funds used to purchase the assets listed above, constitute a violation of 18 U.S.C. § 1957 in that: (1) the deposits were a monetary transaction involving criminally derived funds; (2) those criminally derived funds had a value greater than \$10,000; (3) the funds were derived from wire fraud, in violation of 18 U.S.C.

§ 1343, which is a specified unlawful activity under 18 U.S.C. § 1956(c)(7); and (4) each purchase transaction occurred in the United States.

4. Furthermore, the funds in the accounts listed above and the assets listed above are:
  - a. subject to civil forfeiture, under 18 U.S.C. §§ 981(a)(1)(C) and 984, including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), as property that constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343;
  - b. subject to civil forfeiture, under 18 U.S.C. §§ 981(a)(1)(A) and 984, as funds involved in or traceable to money laundering offenses, committed in violation of 18 U.S.C. §§ 1956 and 1957; and
  - c. subject to seizure for purposes of civil forfeiture under 18 U.S.C. § 981(b).

### **III. PROBABLE CAUSE**

#### **Fraudulent Billing Scheme**

5. The information supplied in this affidavit is based on upon my investigation as well as information provided, and investigation conducted by, other law enforcement personnel (collectively known as “investigators”) in this matter to date, all of which I consider reliable. Because this affidavit is being submitted for the limited purpose of securing a seizure warrant, I have not set forth every fact related to, or otherwise the product of, this investigation.

6. This investigation concerns alleged violations of Title 18, United States Code, Sections 1343 (Wire Fraud), 1956(a)(2) (Laundering of Monetary Instruments), and 1957 (Monetary Transactions derived from Specified Unlawful Activity), which have been committed by CHRISTOPHER HARRIS. The undersigned was informed that HARRIS died unexpectedly from a heart condition on or about November 22, 2024.

7. I was investigating HARRIS, a former Operations Manager and Logistics Supervisor employed by Steel Blue Freight (Steel Blue), a subsidiary of Kapco, which is a metal component manufacturing company based in Grafton, Wisconsin. As part of his normal course of

duties, HARRIS was responsible for oversight of Kapco freight, which gave him access to all Kapco's shipping records, including bills of lading for freight runs completed by Steel Blue. Evidence shows that HARRIS created a shell company, METRO, and used his access to Kapco freight documents, to submit fictitious invoices and bills of lading to third-party freight aggregate companies LPS Global Tranz (Global Tranz) and Superior Transport LLC (Superior). These companies were responsible for issuing payment, on behalf of Kapco, to third-party freight transport companies, who completed transport jobs for Kapco when Steel Blue was unavailable.

8. The fictitious invoices and false bills of lading that HARRIS sent to Global Tranz and Superior were based on legitimate bills of lading, created by Kapco's suppliers. Such bills of lading were provided to Steel Blue transport drivers, who then gave the documents to HARRIS and other Steel Blue employees after the freight transport was complete. Each invoice listed METRO as the company having requested payment along with several freight transport jobs supposedly completed by METRO during the invoices time period. Corresponding with each requested payment line was a bill of lading number. The bill of lading numbers listed on the METRO invoices were from bills of lading that Steel Blue received, from suppliers, during their legitimate transport. Once HARRIS came into possession of these legitimate bills of lading, he duplicated them and altered the name of the transport company from Steel Blue to METRO. Despite altering the name of the transport company, HARRIS did not change the original bill of lading number and listed it on the fictitious METRO invoice.

9. Also on METRO's fictitious invoices was the company's address, "1709 12th Avenue, Grafton, WI 53024." IRS records show HARRIS's daughter, Jamie Christie (formerly Harris), and son-in-law Michael Christie, residing at 1707 12th Avenue in Grafton, Wisconsin. Those two addresses, 1707 and 1709 12th Avenue, are an upper and lower duplex residence.

HARRIS also listed the email address mlmke414@gmail.com on the fictitious invoice and used that same email address to send the fictitious invoices and corresponding bills of lading to Superior and Global Tranz. Included in some of these sent emails, was HARRIS's Kapco email address, [harris@kapcoinc.com](mailto:harris@kapcoinc.com).

10. Once Global Tranz and Superior received the fictitious invoices and bills of lading, they deposited payment to METRO, via wire transfer, into HARRIS' **Metro Hoops Inc BMO Bank account** for which HARRIS is the sole signor. Global Tranz and Superior thus made payments to METRO for freight runs completed by Steel Blue and then invoiced Kapco to be reimbursed for the duplicate payments made to both Steel Blue and METRO.

11. As a result of the fictitious invoices sent by HARRIS to Global Tranz and Superior, Kapco reimbursed both companies a total of approximately \$1,000,566.00 for their payments to METRO. HARRIS's false billing scheme caused Kapco to pay double—once to Steel Blue for legitimately having completed the work, and a second time to METRO, which had not.

12. In addition to this scheme, HARRIS filed false U.S. Individual Income Tax Returns (Form 1040s), for tax years 2019, 2020, 2021, and 2023 that failed to report these illicit proceeds.<sup>1</sup> The only time HARRIS filed a tax form for METRO was on his 2023 Form 1040, Schedule C Profit or Loss from Business (Schedule C). The proprietor listed on the Schedule C is "CHRISTOPHER HARRIS" with a business address of "2711 Prairie Garden Trail, Green Bay, Wisconsin." The business name listed on the Schedule C is "METRO LOGISTICS LLC" which, according to the 2023 Schedule C, began in 2023 and has an EIN of 84-2762513 (the same EIN found on METRO's Form W-9 provided to Global Tranz and Superior). Per the 2023 Schedule C, METRO's gross receipts were \$49,120 and its net profit was \$41,083 after expenses. By contrast,

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<sup>1</sup> The investigation to date has not uncovered payments to METRO as part of the scheme during tax year 2022.



**Metro Hoops Inc BMO Bank account** received \$334,500.00 in deposits from Superior and eShipping in 2023.<sup>2</sup>

13. As a result of HARRIS' fraudulent billing scheme, he received approximately \$920,277.19 between January 27, 2019, and April 25, 2024, all of which was deposited into his **Metro Hoops Inc BMO bank account**.

14. During the course of regular business, Kapco became concerned that the company's profit was less than expected, despite the large amount that Kapco spent on handling its own freight through Steel Blue. As a result, in or about April 2024, Kapco management began an internal audit, which uncovered a disproportionate number of freight transports completed by METRO at a higher-than-expected price. Records provided by Kapco and Superior show that Kapco paid approximately \$310,432.00 to METRO, through Global Tranz, between January 27, 2019, and September 28, 2021. Later, between June 9, 2023, and April 19, 2024, Kapco paid approximately \$690,134.00 to METRO through Superior. To receive these payments, HARRIS sent fictitious METRO invoices and supplier bills of lading, which belonged to Steel Blue, from the email address mlmke414@gmail.com.

15. Investigators served a search warrant on Google LLC on October 17, 2024, and obtained additional evidence from Kapco. In the search warrant return were numerous emails, sent and received by HARRIS at mlmke414@gmail.com, which contained false invoices and other fraudulent documents pertaining to METRO. For example, on August 21, 2019, mlmke414@gmail.com received an email from Global Tranz advising of invoices that they received along with a request for METRO's payment information and a signed Form W-9. In

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<sup>2</sup> The company eShipping acquired Superior during the time that HARRIS was perpetrating this fraud scheme.

response, mlmke414@gmail.com sent Global Tranz a Form W-9 detailing METRO's supposed business information.

16. Several years later, on May 30 and May 31, 2023, HARRIS used his Kapco email address (harris@kapcoinc.com) to request that Superior<sup>3</sup> add METRO as an alternative carrier for Steel Blue. HARRIS forwarded Superior's affirmative response to mlmke414@gmail.com and wrote "see below for contact information and they will get you set up for payment." A few minutes later mlmke414@gmail.com sent an email to Superior stating "see attached W-9, DOT #3702210, MC#1295874. Thank you. Let me know when we are set up and I will forward the invoices." Additional emails from Global Tranz and Superior to mlmke414@gmail.com advised of payment having been sent to METRO as a result of the fictitious invoices HARRIS previously sent to both companies.

17. The Form W-9 that was sent to both Global Tranz and Superior listed METRO (with EIN 84-2762513) as the business. The Form W-9 sent to Global Tranz listed METRO's address as being 1620 E. Capitol Drive #11344,<sup>4</sup> while the Form W-9 later sent to Superior listed METRO's address as being 1709 12th Avenue Grafton, Wisconsin.<sup>5</sup> The signor on both Forms W-9 was "Christy Sirrah." Christy is a derivation of HARRIS's first name, Christopher, as well as his daughter's married name, Christie, and Sirrah is HARRIS's last name spelled backwards.

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<sup>3</sup> At the time of this email, Kapco had ended its business relationship with Global Tranz and was not using Superior for the same service.

<sup>4</sup> 1620 E. Capitol Dr #11344 is a Post Office located a few blocks from where HARRIS resided, at that time, in Shorewood, Wisconsin.

<sup>5</sup> Real Estate records show that **HARRIS's** daughter, Jamie Christie (formerly Harris), and son-in-law Michael Christie, reside at 1707 12th Avenue in Grafton, Wisconsin. Those two addresses, 1707 and 1709 12th Avenue, are an upper and lower duplex residence.



18. Public records from the United States Department of Transportation (DOT) showed that DOT #3702210 (sent by mlmke414@gmail.com to Superior) belongs to METRO. According to DOT, METRO is a general freight and metal transport company that has four “power units” or trucks and four “drivers.” Investigators spoke with DOT employees who advised that companies are not required to submit anything to verify the information submitted about transportation vehicles. DOT records also list METRO’s address as 1709 12th Avenue in Grafton, Wisconsin, along with a business phone number of 920-217-5259. On June 7, 2024, investigators received T-Mobile records which showed the phone number 920-217-5259 belonging to HARRIS since August 24, 2013. HARRIS’s T-Mobile subscriber and billing information list his address as being 2711 Prairie Garden Trail, Green Bay, WI 54313.<sup>6</sup>

19. HARRIS resigned from Kapco on March 28, 2024. On April 1, 2024, he accessed his Kapco email address (harris@kapcoinc.com) and sent an email to a Kapco employee requesting that she send bill of lading information to his personal email. After the employee agreed to do so, HARRIS concluded the email string by stating “mlmke414@gmail.com is my personal email. Thanks.” Google records showed that most logins for mlmke414@gmail.com occurred from IP address 75.184.109.45. Investigators later received IP address records from Charter Communications, which showed the above IP address belongs to RB Pallet Service Inc., located at N1893 Maloney Road, Kaukauna, Wisconsin. IRS records and subsequent surveillance showed HARRIS was employed by RB Pallet Service Inc. and worked at that business address from approximately October of 2023, until his death in November of 2024.

20. Investigators reviewed a form titled “Agreement for Automatic Deposits,” which Superior received from METRO and later provided to Kapco as part of Kapco’s internal inquiry

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<sup>6</sup> IRS records and surveillance confirmed that **HARRIS** resided at 2711 Prairie Garden Trail, Green Bay, Wisconsin.

into METRO. The form was signed by “owner” “Christy Sirrah” (same name as appeared on the Form W-9) and authorized Superior to make deposits into BMO bank account ending in x2431 for work completed by METRO.

**BMO Bank Account 4826752431**

21. Investigators analyzed **BMO account ending in x2431**, which is a non-profit small business checking account in the name of “Metro Hoops Inc,” for which HARRIS is the sole signor. The address listed on the statements for this bank account is HARRIS’s residential address located at 2711 Prairie Garden Trail Green Bay, Wisconsin. Between February 20, 2019, and October 21, 2024, there were approximately \$1,284,000.00 in total deposits made into the account. The two largest sources of deposit were Superior and eShipping (\$609,542.19) and “Teller Deposit” (\$479,678.50).

22. A payment ledger provided by Kapco showed payments made to METRO, through Global Tranz, totaling \$310,735.00 between January 27, 2019, and September 28, 2021. During that same time, the **Metro Hoops Inc BMO bank account** received \$327,180.00 in “Teller Deposits.” In an email sent by HARRIS ([mlmke414@gmail.com](mailto:mlmke414@gmail.com)) to Global Tranz on August 22, 2019, HARRIS requested payment from Global Tranz be sent to METRO via check. As a result, investigators believe that the \$310,735.00 sent from Global Tranz to METRO is contained in the majority of “Teller Deposits.”<sup>7</sup> The remaining deposits in the account were from Mobile Deposits (\$79,368.55), Transfer Credits (\$51,601.62), Venmo (\$38,187.73), and Credit Returns (\$26,375.86). As of May 31, 2023, the balance on the account was \$13,003.91.

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<sup>7</sup> Case agents contacted BMO Harris multiple times requesting supporting documentation for the “Teller Deposits,” but did not receive a response. Case agents also attempted to obtain more complete records from Global Tranz, which attempt was also unsuccessful.

23. On August 8, 2024, and August 9, 2024, **Metro Hoops Inc BMO bank account** received two separate deposits for \$100,000 and \$52,000 from Fidelity. Investigators analyzed Fidelity records and determined that these two deposits were comprised of fraudulent proceeds that HARRIS previously transferred from the **Metro Hoops Inc BMO bank account** to several Fidelity accounts in his name. On August 16, 2024, once this money was deposited back into the **Metro Hoops Inc BMO bank account**, \$134,000 was then transferred to HARRIS's personal BMO checking account x1001. Ten days later, on August 26, 2024, \$15,000 was transferred from the **Metro Hoops Inc BMO bank account** to HARRIS's personal savings account x5826.

24. Below depicts account activity for the **Metro Hoops Inc. BMO bank account**:

<u>Bank</u>	<u>Account Number</u>	<u>Date</u>	<u>Credit Amount</u>	<u>Debit Amount</u>	<u>Description</u>
BMO	4826752431	2/20/2019	\$100.00		Teller Deposit
BMO	4826752431	2/25/2019	\$11,095.00		Teller Deposit
BMO	4826752431	2/27/2019	\$10,000.00		Teller Deposit
BMO	4826752431	1/22/2020	\$14,960.00		Teller Deposit
BMO	4826752431	2/24/2020	\$165.00		Teller Deposit
BMO	4826752431	3/2/2020	\$30,575.00		Teller Deposit
BMO	4826752431	10/8/2020	\$4,900.00		Teller Deposit
BMO	4826752431	10/13/2020	\$5,150.00		Teller Deposit
BMO	4826752431	10/19/2020	\$4,850.00		Teller Deposit
BMO	4826752431	10/27/2020	\$3,800.00		Teller Deposit
BMO	4826752431	11/2/2020	\$3,250.00		Teller Deposit
BMO	4826752431	11/9/2020	\$13,740.00		Teller Deposit
BMO	4826752431	12/17/2020	\$7,500.00		Teller Deposit
BMO	4826752431	1/20/2021	\$9,000.00		Teller Deposit
BMO	4826752431	2/17/2021	\$9,000.00		Teller Deposit
BMO	4826752431	3/15/2021	\$6,000.00		Teller Deposit
BMO	4826752431	3/16/2021	\$3,575.00		Teller Deposit
BMO	4826752431	3/19/2021	\$2,675.00		Teller Deposit
BMO	4826752431	3/23/2021	\$4,000.00		Teller Deposit
BMO	4826752431	3/26/2021	\$3,950.00		Teller Deposit
BMO	4826752431	3/29/2021	\$7,675.00		Teller Deposit
BMO	4826752431	3/31/2021	\$4,375.00		Teller Deposit
BMO	4826752431	4/7/2021	\$2,100.00		Teller Deposit
BMO	4826752431	4/16/2021	\$7,300.00		Teller Deposit
BMO	4826752431	5/20/2021	\$8,450.00		Teller Deposit
BMO	4826752431	5/25/2021	\$1,225.00		Teller Deposit

BMO	4826752431	6/21/2021	\$7,550.00	Teller Deposit
BMO	4826752431	7/22/2021	\$47,100.00	Teller Deposit
BMO	4826752431	8/20/2021	\$51,200.00	Teller Deposit
BMO	4826752431	9/23/2021	\$41,600.00	Teller Deposit
BMO	4826752431	10/27/2021	\$57,000.00	Teller Deposit
BMO	4826752431	12/17/2021	\$10,000.00	Teller Deposit
BMO	4826752431	3/14/2022	\$2,450.00	Teller Deposit
BMO	4826752431	3/21/2022	\$2,050.00	Teller Deposit
BMO	4826752431	4/4/2022	\$14,715.00	Teller Deposit
BMO	4826752431	4/6/2022	\$4,900.00	Teller Deposit
BMO	4826752431	4/8/2022	\$8,950.00	Teller Deposit
BMO	4826752431	4/14/2022	\$1,750.00	Teller Deposit
BMO	4826752431	4/29/2022	\$450.00	Teller Deposit
BMO	4826752431	5/6/2022	\$850.00	Teller Deposit
BMO	4826752431	9/2/2022	\$1,000.00	Teller Deposit
BMO	4826752431	10/3/2022	\$1,000.00	Teller Deposit
BMO	4826752431	11/18/2022	\$1,000.00	Teller Deposit
BMO	4826752431	12/12/2022	\$500.00	Teller Deposit
BMO	4826752431	1/5/2023	\$500.00	Teller Deposit
BMO	4826752431	1/20/2023	\$100.00	Teller Deposit
BMO	4826752431	2/6/2023	\$1,000.00	Teller Deposit
BMO	4826752431	3/6/2023	\$300.00	Teller Deposit
BMO	4826752431	3/6/2023	\$1,490.00	Teller Deposit
BMO	4826752431	3/16/2023	\$2,350.00	Teller Deposit
BMO	4826752431	3/24/2023	\$3,413.50	Teller Deposit
BMO	4826752431	3/27/2023	\$3,375.00	Teller Deposit
BMO	4826752431	3/29/2023	\$3,175.00	Teller Deposit
BMO	4826752431	3/30/2023	\$1,850.00	Teller Deposit
BMO	4826752431	4/5/2023	\$7,050.00	Teller Deposit
BMO	4826752431	4/26/2023	\$5,000.00	Teller Deposit
BMO	4826752431	6/14/2023	\$9,250.00	Superior Deposit
BMO	4826752431	6/21/2023	\$4,000.00	Superior Deposit
BMO	4826752431	6/28/2023	\$2,500.00	Superior Deposit
BMO	4826752431	7/5/2023	\$6,500.00	Superior Deposit
BMO	4826752431	7/12/2023	\$12,000.00	Superior Deposit
BMO	4826752431	7/27/2023	\$14,000.00	Superior Deposit
BMO	4826752431	8/2/2023	\$7,000.00	Superior Deposit
BMO	4826752431	8/8/2023	\$1,100.00	Teller Deposit
BMO	4826752431	8/9/2023	\$10,000.00	Superior Deposit
BMO	4826752431	8/16/2023	\$8,500.00	Superior Deposit
BMO	4826752431	8/23/2023	\$14,500.00	Superior Deposit
BMO	4826752431	8/30/2023	\$17,000.00	Superior Deposit
BMO	4826752431	9/8/2023	\$10,000.00	Superior Deposit
BMO	4826752431	9/14/2023	\$20,000.00	Superior Deposit

BMO	4826752431	9/21/2023	\$7,000.00	Superior Deposit
BMO	4826752431	9/28/2023	\$42.19	Superior Deposit
BMO	4826752431	10/11/2023	\$16,500.00	Superior Deposit
BMO	4826752431	10/18/2023	\$11,500.00	Superior Deposit
BMO	4826752431	10/25/2023	\$18,250.00	Superior Deposit
BMO	4826752431	11/1/2023	\$16,500.00	Superior Deposit
BMO	4826752431	11/8/2023	\$1,500.00	Superior Deposit
BMO	4826752431	11/13/2023	\$15,500.00	Teller Deposit
BMO	4826752431	11/15/2023	\$14,000.00	Superior Deposit
BMO	4826752431	11/22/2023	\$10,500.00	Superior Deposit
BMO	4826752431	11/29/2023	\$11,500.00	Superior Deposit
BMO	4826752431	12/6/2023	\$13,500.00	Superior Deposit
BMO	4826752431	12/13/2023	\$16,000.00	Superior Deposit
BMO	4826752431	12/20/2023	\$19,500.00	Superior Deposit
BMO	4826752431	12/28/2023	\$8,500.00	Superior Deposit
BMO	4826752431	1/4/2024	\$12,500.00	Superior Deposit
BMO	4826752431	1/10/2024	\$14,000.00	Superior Deposit
BMO	4826752431	1/19/2024	\$14,500.00	Superior Deposit
BMO	4826752431	1/25/2024	\$15,000.00	Superior Deposit
BMO	4826752431	2/1/2024	\$4,500.00	CCD eShipping Deposit
BMO	4826752431	2/8/2024	\$21,500.00	CCD eShipping Deposit
BMO	4826752431	2/15/2024	\$27,500.00	CCD eShipping Deposit
BMO	4826752431	2/22/2024	\$12,000.00	CCD eShipping Deposit
BMO	4826752431	2/29/2024	\$27,000.00	CCD eShipping Deposit
BMO	4826752431	3/7/2024	\$13,500.00	CCD eShipping Deposit
BMO	4826752431	3/14/2024	\$25,500.00	CCD eShipping Deposit
BMO	4826752431	3/21/2024	\$29,000.00	CCD eShipping Deposit
BMO	4826752431	3/28/2024	\$13,500.00	CCD eShipping Deposit
BMO	4826752431	4/4/2024	\$23,500.00	CCD eShipping Deposit
BMO	4826752431	4/11/2024	\$14,500.00	CCD eShipping Deposit
BMO	4826752431	4/18/2024	\$19,000.00	CCD eShipping Deposit
BMO	4826752431	4/25/2024	\$22,500.00	CCD eShipping Deposit
BMO	4826752431	08/08/2024	\$100,000.00	Deposit from HARRIS's Fidelity account
BMO	4826752431	08/09/2024	\$52,000.00	Deposit from HARRIS's Fidelity account
BMO	4826752431	08/16/2024	\$134,000.00	Transfer to HARRIS's personal checking account x1001
BMO	4826752431	08/26/2024	\$15,000.00	Transfer to HARRIS's personal BMO savings account x5826

### Fidelity Accounts

25. Records from Fidelity show that HARRIS opened several investment and retirement accounts that received fraud proceeds originally deposited into **Metro Hoops BMO bank account x2431** before being moved into his various Fidelity accounts. The proceeds of fraud were primarily the only deposits made into these Fidelity investment and retirement accounts.

26. **Fidelity Individual Brokerage account Z29149206** was opened by HARRIS on March 24, 2023, and Julie Harris was added as an authorized agent on January 20, 2024. The account opening documents show HARRIS's residential address as 1709 12<sup>th</sup> Avenue Grafton, Wisconsin, his phone number as 920-217-5259, and his email as metroharris@gmail.com. HARRIS further listed his employment information as an "Operations Manager" at Kapco. On June 21, 2023, Fidelity sent HARRIS a letter confirming that **Fidelity account x9206** had been linked to **Metro Hoops BMO account x2431**.

27. Between June 22, 2023, and August 31, 2024, \$67,322.30 was deposited into this account. \$42,243.00 of the \$67,322.30 originated from electronic transfers that were received from the **Metro Hoops Inc BMO bank account**. The remaining \$24,995.00 was transferred from HARRIS's **Fidelity Cash account x6573** which similarly received the \$24,995.00 from the **Metro Hoops BMO account**. As of December 3, 2024, this account balance is \$14,194.00, after \$52,000 was transferred back to the **Metro Hoops Inc BMO bank account** on August 9, 2024. The chart below shows the deposits made into HARRIS's **Fidelity Individual Brokerage account Z29149206**:

Date	Deposit	Withdrawal	Description
6/22/2023	\$500.00		Electronic Transfer from HARRIS's BMO Acct x2431
6/26/2023	\$500.00		Electronic Transfer from HARRIS's BMO Acct x2431
8/2/2023	\$750.00		Electronic Transfer from HARRIS's BMO Acct x2431
8/9/2023	\$2,000.00		Electronic Transfer from HARRIS's BMO Acct x2431
8/16/2023	\$1,000.00		Electronic Transfer from HARRIS's BMO Acct x2431

8/23/2023	\$2,500.00	Electronic Transfer from HARRIS's BMO Acct x2431
2/21/2024	\$4,999.00	Transfer from HARRIS's Fidelity Investment Cash Account x6573
3/14/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
3/20/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
3/26/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
3/26/2024	\$4,999.00	Transfer from HARRIS's Fidelity Investment Cash Account x6573
3/27/2024	\$4,999.00	Transfer from HARRIS's Fidelity Investment Cash Account x6573
3/28/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
3/28/2024	\$4,999.00	Transfer from HARRIS's Fidelity Investment Cash Account x6573
3/28/2024	\$4,999.00	Transfer from HARRIS's Fidelity Investment Cash Account x6573
4/1/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
4/3/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
4/4/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
4/11/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
8/9/2024	-\$52,000.00	Transfer to HARRIS's METRO BMO Acct 2431

28. **Fidelity IRA account 238950242** was opened by HARRIS on June 21, 2023, and Julie Harris was added as an authorized agent on January 20, 2024. The account opening documents show HARRIS's residential address as 1709 12th Avenue Grafton, Wisconsin, and his email as metroharris@gmail.com. HARRIS listed his employment information as being an "Operations Manager" at Kapco. On June 21, 2023, Fidelity sent HARRIS a letter confirming that Fidelity account x0242 had been linked to **Metro Hoops BMO account x2431**.

29. Between June 22, 2023, and January 4, 2024, **Fidelity account x0242** received \$14,200.00 in deposits. All these deposits came from the **Metro Hoops Inc BMO bank account**. The balance of this account, as of December 4, 2024, was \$19,073.53, which is greater than the amount deposited into the account due to return on investments that were made during this time. The chart below shows the deposits made into HARRIS's **Fidelity Individual Brokerage account 238950242**:



Date	Deposit	Withdrawal	Description
6/22/2023	\$500.00		Cash Contribution from HARRIS's BMO Acct x2431
6/28/2023	\$700.00		Cash Contribution from HARRIS's BMO Acct x2431
7/5/2023	\$750.00		Cash Contribution from HARRIS's BMO Acct x2431
7/12/2023	\$2,000.00		Cash Contribution from HARRIS's BMO Acct x2431
7/27/2023	\$2,250.00		Cash Contribution from HARRIS's BMO Acct x2431
1/2/2024	\$4,999.00		Cash Contribution from HARRIS's BMO Acct x2431
1/4/2024	\$3,001.00		Cash Contribution from HARRIS's BMO Acct x2431

30. **Fidelity Cash Management account Z23676573** was opened by HARRIS on August 28, 2023, and Julie Harris was added as an authorized agent on January 20, 2024. The account opening documents show HARRIS's residential address as 1709 12th Avenue Grafton, Wisconsin, his phone number as 920-217-5259, and his email as metroharris@gmail.com. HARRIS listed his employment information as being an "Operations Manager" at Kapco. On August 28, 2023, Fidelity sent HARRIS a letter confirming that **Fidelity account x6573** had been linked to the **Metro Hoops Inc BMO bank account**.

31. Between August 28, 2023, and August 31, 2024, \$141,015.10 was deposited into this Fidelity account x6573. Of that amount, \$135,985.89 came directly from the **Metro Hoops Inc BMO bank account**. The remaining \$5,029.17 was transferred from HARRIS's **Fidelity Brokerage account x9206** which is also comprised solely of deposits from the **Metro Hoops Inc BMO bank account**. On August 8, 2024, a \$100,000 withdrawal occurred from this account and went to the **Metro Hoops Inc BMO bank account**. As of December 4, 2024, the balance of **Fidelity account x6573** is \$14,559.00. The chart below shows the deposits made into HARRIS's **Fidelity account Z23676573**:

Date	Deposit	Withdrawal	Description
8/28/2023	\$4,727.23		Transfer from HARRIS's Fidelity Investment Brokerage Account x9206
8/30/2023	\$2,500.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/11/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
9/12/2023	\$1,500.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/14/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/15/2023	\$2,500.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/21/2023	\$2,500.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/22/2023	\$2,000.00		Electronic Transfer from HARRIS's BMO Acct x2431
9/28/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
10/12/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
10/13/2023	\$19.63		Transfer from HARRIS's Fidelity Investment Brokerage Account x9206
10/19/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
10/23/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
10/25/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
10/27/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
11/1/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
11/2/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
11/3/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
11/6/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
11/14/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
11/16/2023	\$4,999.00		Electronic Transfer from HARRIS's BMO Acct x2431
11/29/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431
12/6/2023	\$4,999.99		Electronic Transfer from HARRIS's BMO Acct x2431

12/13/2023	\$4,999.99	Electronic Transfer from HARRIS's BMO Acct x2431
12/21/2023	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
12/22/2023	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
12/26/2023	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
1/10/2024	\$4,999.99	Electronic Transfer from HARRIS's BMO Acct x2431
1/29/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
5/6/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
5/7/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
5/17/2024	\$4,999.00	Electronic Transfer from HARRIS's BMO Acct x2431
8/8/2024	\$100,000.00	Transfer to HARRIS's METRO BMO Bank x2431

32. Fidelity SEP IRA Account 257263765 was opened by HARRIS on April 12, 2024. The account opening documents show HARRIS's residential address as 2711 Prairie Garden Trail, Green Bay, Wisconsin, his phone number as 920-217-5259, and his email as metroharris@gmail.com. HARRIS listed his employment information as being an "Operations Manager" at Kapco. On April 12, 2024, Fidelity sent HARRIS a letter confirming **that Fidelity account x3765** had been linked the **Metro Hoops Inc BMO bank account**.

33. Between April 12, 2024, and August 31, 2024, \$14,997.00 was deposited into this account, all of which came from the **Metro Hoops Inc BMO bank account**. The balance of this account, as of December 4, 2024, was \$17,988.00, which is greater than the amount deposited into the account due to return on investments that were made during this time. The chart below shows the deposits made into HARRIS's **Fidelity account 257263765**:

Date	Deposit	Withdrawal	Description
4/12/2024	\$4,999.00		SEP Contribution from HARRIS's BMO Account x2431

4/17/2024 \$4,999.00

SEP Contribution from HARRIS's  
BMO Account x2431

4/22/2024 \$4,999.00

SEP Contribution from HARRIS's  
BMO Account x2431

**Bridgecrest Credit Company**

34. Records from Bridgecrest Credit Company showed HARRIS having purchased a **Gray 2018 Dodge Ram Crew Cab Pickup Truck** with VIN 3C6RR7LG9JG195986 on April 8, 2021, for \$51,432.08. . IRS records show that the **Dodge Ram** is registered to HARRIS. The purchase amount consisted of a \$5,000.00 down payment, \$40,450.07 in financing, and a \$5,982.01 finance charge. The \$5,000.00 down payment was made from the **Metro Hoops Inc BMO bank account** on April 9, 2021. Upon signing the contract, **HARRIS** agreed to pay \$654 per month beginning on May 8, 2021, through March 8, 2027. To make the payments for **Dodge Ram**, HARRIS linked his personal BMO bank account (x1001) and the **Metro Hoops Inc BMO bank account** to the vehicle finance account. From May 7, 2021, through July 24, 2023, payments totaling \$20,540 were made toward the **Dodge Ram**. The payment amounts during this time consisted of either \$1,000 or \$654 per month.

35. Between August 9, 2023, and September 1, 2023, the remaining \$23,332.00 for the Dodge Ram was paid off. These payments consisted of amounts that were significantly larger than the previous monthly payments. Investigators were able to determine that the funds used to pay the remaining \$23,332.00 were proceeds of HARRIS's fraud that were previously deposited into the **Metro Hoops Inc BMO bank account** from Superior. The payments made on the **Dodge Ram** occurred on the same day in which deposits were received from Superior. The chart below shows the payments to Bridgecrest Credit Company from the **Metro Hoops Inc BMO bank account**, after HARRIS received deposits from Superior:

<u>Date</u>	<u>Credit Amount</u>	<u>Debit Amount</u>	<u>Description</u>
08/09/2023	\$10,000.00		Superior Transport Vendor Pay into BMO x2431
08/09/2023		\$2,000.00	Payment to Bridgecrest Credit Company for Dodge Ram
08/16/2023	\$8,500.00		Superior Transport Vendor Pay into BMO x2431
08/16/2023		\$4,999.00	Payment to Bridgecrest Credit Company for Dodge Ram
08/23/2023	\$14,500.00		Superior Transport Vendor Pay into BMO x2431
08/23/2023		\$4,999.99	Payment to Bridgecrest Credit Company for Dodge Ram
08/25/2023		\$3,000.00	Payment to Bridgecrest Credit Company for Dodge Ram
08/30/2023	\$17,000.00		Superior Transport Vendor Pay into BMO x2431
08/30/2023		\$4,999.99	Payment to Bridgecrest Credit Company for Dodge Ram
09/01/2023		\$3,333.02	Payment to Bridgecrest Credit Company for Dodge Ram

36. Bridgecrest Credit Company records further showed that on January 13, 2024, HARRIS purchased a **Black 2021 Land Rover Range Rover Evoque Sport Utility Vehicle** with VIN SALZP2FX0MH15235 for \$58,998.61. IRS records show that the **Land Rover SUV** is registered to both HARRIS and Julie Harris. This purchase consisted of a \$2,990.00 down payment (investigators were unable to locate the source of these funds), \$44,112.00 in financing, and a \$11,896.61 finance charge. HARRIS agreed to make seventy-four payments of \$748 and one payment of \$656.61 beginning on February 13, 2024, through April 13, 2030.

37. From January 26, 2024, through March 14, 2024, HARRIS paid the entire balance of the **Land Rover SUV**, which totaled \$44,472.72 after interest. HARRIS paid very little of the finance charge due to how quickly he paid the remaining balance on the **Land Rover SUV**. Each payment made toward the **Land Rover SUV** came from proceeds of HARRIS's fraud scheme that were deposited into the **Metro Hoops Inc BMO bank account** just prior to HARRIS's payments

on the **Land Rover SUV**. The chart below shows the payments to Bridgecrest Credit Company from the **Metro Hoops Inc BMO bank account**, after HARRIS received deposits from Superior:

<u>Date</u>	<u>Credit Amount</u>	<u>Debit Amount</u>	<u>Description</u>
01/25/2024	\$15,000.00		Superior Transport Vendor Pay into BMO x2431
01/29/2024		\$4,999.00	Payment to Bridgecrest Credit Company for Land Rover SUV
02/01/2024	\$4,500.00		CCD eShipping LLC Auto Pay into BMO x2431
02/01/2024		\$4,999.00	Payment to Bridgecrest Credit Company for Land Rover SUV
02/08/2024	\$21,500.00		CCD eShipping LLC Auto Pay into BMO x2431
02/08/2024		\$4,999.99	Payment to Bridgecrest Credit Company for Land Rover SUV
02/13/2024		\$748.00	Payment to Bridgecrest Credit Company for Land Rover SUV
02/15/2024	\$27,500.00		CCD eShipping LLC Auto Pay into BMO x2431
02/15/2024		\$4,999.99	Payment to Bridgecrest Credit Company for Land Rover SUV
02/22/2024	\$12,000.00		CCD eShipping LLC Auto Pay into BMO x2431
02/22/2024		\$4,999.00	Payment to Bridgecrest Credit Company for Land Rover SUV
02/29/2024	\$27,000.00		CCD eShipping LLC Auto Pay into BMO x2431
02/29/2024		\$4,999.99	Payment to Bridgecrest Credit Company for Land Rover SUV
03/06/2024		\$4,999.00	Payment to Bridgecrest Credit Company for Land Rover SUV
03/07/2024	\$13,500.00		CCD eShipping LLC Auto Pay into BMO x2431
03/07/2024		\$4,150.00	Payment to Bridgecrest Credit Company for Land Rover SUV
03/13/2024		\$748.00	Payment to Bridgecrest Credit Company for Land Rover SUV
03/14/2024	\$25,500.00		CCD eShipping LLC Auto Pay into BMO x2431
03/14/2024		\$3,830.75	Payment to Bridgecrest Credit Company for Land Rover SUV

### Wells Fargo Auto Loan Records

38. Records from Wells Fargo show that on June 9, 2023, HARRIS purchased a **Black 2016 Jeep Wrangler Unlimited Sport Utility Vehicle** with VIN 1C4BJWDG0GL228332 for \$31,190.96. IRS records show that the Jeep Wrangler is registered to HARRIS and Julie Harris. The payment for the **Jeep Wrangler** consisted of a \$4,700.00 down payment, \$20,686.95 in financing, and a \$5,804.01 finance charge. HARRIS's down payment is believed to have been made with a \$4,700 check (number 7561) that was written from his personal BMO bank account (x1001) and posted on June 13, 2023. HARRIS agreed to begin payments of \$367.93 for the **Jeep Wrangler** on June 24, 2023. Similar to the other vehicles, HARRIS paid very little of the finance charge due to how quickly he paid the remaining balance on the **Jeep Wrangler**.

39. From July 13, 2023, through August 22, 2023, the remaining auto loan balance on the **Jeep Wrangler** was paid from the **Metro Hoops Inc BMO bank account** to Wells Fargo. This consisted of six payments, totaling \$20,924.51, which were made after deposits of fraudulent proceeds from Superior were made into the **Metro Hoops Inc BMO bank account**:

Bank	Account Number	Date	Credit Amount	Debit Amount	Description
BMO	4826752431	07/12/2023	\$12,000.00		Superior Transport Vendor Pay
BMO	4826752431	07/13/2023		\$4,999.00	Wells Fargo Auto Payment
BMO	4826752431	07/27/2023	\$14,000.00		Superior Transport Vendor Pay
BMO	4826752431	07/28/2023		\$4,999.00	Wells Fargo Auto Payment
BMO	4826752431	08/02/2023	\$7,000.00		Superior Transport Vendor Pay
BMO	4826752431	08/03/2023		\$4,999.99	Wells Fargo Auto Payment
BMO	4826752431	08/09/2023	\$10,000.00		Superior Transport Auto Pay
BMO	4826752431	08/09/2023		\$4,999.99	Wells Fargo Auto Payment
BMO	4826752431	08/16/2023	\$8,500.00		Superior Transport Vendor Pay
BMO	4826752431	08/17/2023		\$900.52	Wells Fargo Auto Payment
BMO	4826752431	08/22/2023		\$26.01	Wells Fargo Auto Payment



### **Belief as to Assets' Whereabouts at 2711 Prairie Garden Trail, Green Bay, Wisconsin**

40. While working for Steel Blue, HARRIS and his wife, Julie Harris, resided in apartments located in both Shorewood and Mequon, Wisconsin. In the summer of 2023, HARRIS advised Kapco management that he needed to move to the Green Bay, Wisconsin, area to be with his wife, who had previously moved there to care for an ill parent. When HARRIS's wife moved to Green Bay, Wisconsin, HARRIS temporarily resided at his daughter's residence located at 1707 12th Avenue Grafton, Wisconsin. HARRIS agreed to continue working remotely for Steel Blue, for approximately six more months, until Steel Blue transitioned someone into HARRIS's position. When HARRIS moved back to Green Bay to begin working remotely, mortgage and IRS records show that HARRIS and his wife Julie resided at 2711 Prairie Garden Trail, Green Bay, WI 54313. Furthermore, on April 8, 2024, Kapco mailed HARRIS a letter confirming his separation of employment from the company as of March 28, 2024. This letter listed HARRIS's address as "2711 Prairie Garden Trail, Green Bay, Wisconsin 54313."

41. On October 30, 2024, at approximately 12:00 P.M., investigators drove by HARRIS's residence at 2711 Prairie Garden Trail Green Bay, Wisconsin. In the driveway of the residence, parked in front of the garage, was a **2016 Black Jeep Wrangler** with Wisconsin license plate ASY-6882. Wisconsin Department of Motor Vehicle Records show the Jeep to be registered to HARRIS and his wife Julie Harris.

42. On November 6, 2024, at approximately 11:00 A.M., investigators conducted surveillance outside of RB Pallet Service, located at N1893 Maloney Road in Kaukauna, Wisconsin, where IRS records show HARRIS to be employed. At approximately 11:02 A.M., investigators observed a **Gray 2018 Dodge Ram 1500** bearing Wisconsin license plate SC2014 exit the business parking lot. Wisconsin Department of Motor Vehicle (DMV) records show that

this vehicle is registered to HARRIS. Investigators followed the **Dodge Ram 1500** to the Kwik Trip located at 1101 Gertrude Street in Kaukauna, Wisconsin. HARRIS, whom investigators were able to identify from his Wisconsin driver's license picture, was observed exiting the Gray 2018 Dodge Ram 1500 and entering Kwik Trip before then getting back into the vehicle. HARRIS left Kwik Trip at approximately 11:30 A.M. and returned to RB Pallet Service, where he parked the 2018 Dodge Ram 1500, exited the vehicle, and entered the business.

43. Later in the evening of November 6, 2024, investigators observed the same **Gray Dodge Ram 1500** park in the attached garage of 2711 Prairie Garden Trail Green Bay, Wisconsin. HARRIS exited the vehicle holding a black computer bag, with a shoulder strap, in his hand. HARRIS carried the bag as he walked into the front yard of the residence with a small dog. At 5:58 P.M., HARRIS went into the residence through the garage, with the black bag, and closed the garage door behind him.

44. On November 7, 2024, at 6:23 A.M., investigators observed the lights to 2711 Prairie Garden Trail Green Bay, Wisconsin turned on. HARRIS's wife, Julie, whom investigators were able to identify from her Wisconsin driver's license picture, exited the residence with a small dog at 6:36 A.M. before returning into the residence at 6:39 A.M. Several minutes later, at 7:03 A.M., the attached garage to the residence opened and a **Black 2021 Land Rover Range Rover Evoque SUV** bearing Wisconsin license plate AWN-4152 backed out of the garage. Wisconsin DMV records show that this vehicle is registered to Julie and CHRISTOPHER HARRIS. Investigators observed that the **Gray Dodge Ram 1500**, which HARRIS had parked in the garage the night before, was already gone.

45. Investigators surveilled the **2021 Land Rover SUV** from 2711 Prairie Garden Trail Green Bay, Wisconsin to the Glenbrook Elementary School Parking lot at 143 W. Green Bay

Street in Pulaski, Wisconsin. Julie Harris was observed in the driver's seat of the vehicle as it parked in the lot at approximately 7:25 A.M. At approximately 8:10 A.M., investigators observed HARRIS's **Gray Dodge Ram 1500** in the parking lot of RB Pallet Service. Later the same day, at 4:38 P.M., investigators again observed HARRIS's **Gray Dodge Ram 1500** pull into the garage of 2711 Prairie Garden Trail Green Bay, Wisconsin, and saw HARRIS exit the vehicle before entering the residence. HARRIS returned outside at 4:40 P.M. with a small dog before going back inside, with the dog, at 4:54 P.M.

46. On November 8, 2024, at approximately 6:05 A.M., investigators drove by 2711 Prairie Garden Trail Green Bay, Wisconsin and observed the lights to the residence turned on. At 6:56 A.M. Julie Harris exited the residence with a small dog before returning inside at 6:58 A.M. Several minutes later, at 7:06 A.M., the garage door to the residence opened and the **Black Land Rover SUV** exited the garage before closing it and leaving the area. Investigators again noticed that HARRIS's **Gray Dodge Ram 1500** was already gone from the garage. At 7:30 A.M., investigators observed HARRIS's **Gray Dodge Ram 1500** parked in the lot of RB Pallet Service.

47. On November 12, 2024, at approximately 5:00 A.M. investigators began surveillance outside of 2711 Prairie Garden Trail Green Bay, Wisconsin. At 5:55 A.M. investigators observed HARRIS's **Gray Dodge Ram 1500** with Wisconsin license plate SC2014 exit the driveway of the residence. Investigators surveilled HARRIS's pickup truck as it traveled to RB Pallet Service Inc, via Southbound Interstate 41, where it ultimately was parked in front of the business entrance.

48. On December 6, 2024, at 12:06 P.M., investigators observed one of the garage doors to 2711 Prairie Garden Trail Green Bay, Wisconsin ajar. Inside the garage, investigators saw HARRIS's **Gray Dodge 1500** with Wisconsin license plate SC2014 and the **Black Land Rover**

SUV with license plate AWN-4152. The other garage door, where the **Black Jeep Wrangler** was previously observed parked in front of, remained closed.

#### IV. CONCLUSION

49. Based on the foregoing facts, I submit that there exists probable cause to believe that the \$564,500.00 deposited into the **Metro Hoops Inc BMO bank account** between June 12, 2023, and March 28, 2024, are proceeds of the double billing fraud scheme HARRIS perpetrated on Kapco through the creation of METRO. HARRIS then “layered” the proceeds by depositing the funds into his other accounts at BMO and Fidelity and using the funds to purchase the assets listed above, concealing and disguising the original source of the funds.

50. I further submit that the \$8,240.13 remaining in **BMO account ending in x2431**, along with the \$65,814.53 remaining in HARRIS’s **Fidelity portfolio**, and HARRIS’s **Dodge Ram Pickup Truck, Land Rover SUV, and Jeep Wrangler** are:

- a. subject to civil forfeiture, under 18 U.S.C. §§ 981(a)(1)(C) and 984, including cross-references to 18 U.S.C. §§ 1956(c)(7) and 1961(1), as property that constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343;
- b. subject to civil forfeiture, under 18 U.S.C. §§ 981(a)(1)(A) and 984, as funds involved in or traceable to money laundering offenses, committed in violation of 18 U.S.C. §§ 1956 and 1957; and
- c. subject to seizure for purposes of civil forfeiture under 18 U.S.C. § 981(b).

Dated this 17th day of December, 2024

*Jeremy Grobart*

Jeremy Grobart – Special Agent  
IRS – Criminal Investigation Division

Telephonically sworn before me on 18th day of December, 2024.

*William C. Griesbach*  
HONORABLE WILLIAM GRIESBACH  
United States District Judge

